

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

GLENN BURTON, JR.,
Plaintiff,

v.

Case No. 07-C-303

AMERICAN CYANAMID CO., et al.
Defendants.

SPECIAL VERDICT

Question 1: Did plaintiff Glenn Burton, Jr. ingest white lead carbonate pigment?

Answer: yes
Yes or No

If your answer to Question 1 is "no," then do not answer any other question. Proceed to the final page and sign/date this form.

If you answer Question 1 "yes," then answer Question 2.

Question 2: Did Burton's ingestion of white lead carbonate cause an injury?

Answer: yes
Yes or No

If the answer to Question 2 is "no," do not answer any other question. Proceed to the final page and sign/date this form.

If you answer Question 2 "yes," then answer Question 3.

Question 3: Answering separately for each defendant listed below, did the defendant prove that it did not produce or market white lead carbonate ingested by Burton?

- a. Atlantic Richfield
Yes _____ No X
- b. Armstrong Containers, Inc.
Yes _____ No X
- c. E.I. du Pont de Nemours Company
Yes _____ No X
- d. Sherwin-Williams Company
Yes _____ No X

If you answered "yes" as to any defendant in question 3, answer no further questions as to that defendant.

Considering only those defendants for whom you answered "no" in Question 3, answer Questions 4 and 5:

Question 4: Answering separately for each defendant, was the defendant negligent in producing or marketing white lead carbonate?

- a. Atlantic Richfield
Yes _____ No X
- b. Armstrong Containers, Inc.
Yes X No _____
- c. E.I. du Pont de Nemours Company
Yes X No _____
- d. Sherwin-Williams Company
Yes X No _____

Question 5: Answering separately for each defendant listed below, was the white lead carbonate manufactured and sold by the defendant defective and unreasonably dangerous due to inadequate warnings at the time the product was sold?

- a. Atlantic Richfield
Yes _____ No X
- b. Armstrong Containers, Inc.
Yes X No _____
- c. E.I. du Pont de Nemours Company
Yes X No _____
- d. Sherwin-Williams Company
Yes X No _____

Considering only those defendants for whom you answered "yes" to question 5, answer Question 6:

Question 6: Answering separately for each defendant listed below, were the defendant's inadequate warnings a cause of Burton's injuries?

- a. Atlantic Richfield
Yes _____ No _____
- b. Armstrong Containers, Inc.
Yes X No _____
- c. E.I. du Pont de Nemours Company
Yes X No _____
- d. Sherwin-Williams Company
Yes X No _____

If you answered "yes" as to any defendant on Question 4 or Question 6, then answer Question 7:

Question 7: What amount of money will fairly compensate Burton for his injuries caused by ingesting white lead carbonate:

\$ 2,000,000.

Each juror should sign this verdict form.